


# GROOM LAW GROUP

June 25, 2025

Application granted. Defendant may answer or otherwise respond to the Petition and file an opposition to the Motion on or before August 1, 2025.

SO ORDERED.



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Date: New York, New York

June 30, 2025

## Via ECF

The Honorable Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: TV Seshan, MD PC v. CDPHP Universal Benefits, Case No. 1:25-cv-04384**

Dear Judge Buchwald:

This firm represents Defendant CDPHP Universal Benefits, Inc. (“CDPHP”) in the above-reference matter. Pursuant to Local Rule 7.1(e) and Rule 1.B of Your Honor’s Individual Practices, we respectfully request an extension of time for (1) CDPHP to answer or move in response to Plaintiff TV Seshan MD PC’s (“TV Seshan”) Petition to Confirm Arbitration Award and Entry of Judgment (“Petition”) from July 7, 2025 to August 1, 2025; and (2) CDPHP to oppose TV Seshan’s Motion to Confirm Arbitration Award and Entry of Judgment (“Motion”) from June 27, 2025 to August 1, 2025.

We have consulted with TV Seshan’s counsel, who consent to the requested extension. This is the first request by any party to extend the response deadlines. The requested extension will not affect any further deadlines in the case.

Good cause exists for CDPHP’s request, as follows:

On May 23, 2025, TV Seshan’s Petition and Motion were filed and docketed (Dkt. 1);

On June 13, 2025, the Petition and Motion were served on CDPHP (Dkt. 8)

On June 16, 2025, TV Seshan filed an Affidavit of Service for CDPHP (Dkt. 8), which calculated CDPHP’s response deadline as July 7, 2025.

Our firm has recently been retained as attorneys for CDPHP in this action. As such, we require additional time in order to investigate the allegations of TV Seshan’s Complaint and Motion, gather information and documents related to the claims at issue, and prepare the appropriate response.

For the reasons stated above, CDPHP requests, and TV Seshan consent to, an extension of its deadline to answer, plead or otherwise respond to the Petition from July 7, 2025 to August 1, 2025; and its deadline to oppose the Motion from June 27, 2025 to August 1, 2025.

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Hon. Naomi Reice Buchwald

June 25, 2025

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Respectfully,

/s/ Jovana Vujovic

Jovana Vujovic

GROOM LAW GROUP, CHARTERED

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cc: Counsel of Record (via Electronic Case Filing)